

# THE WOOSTER GROUP

October 10, 2017

Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
c/o Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of The Wooster Group theater company, located in New York City, that provides approximately 60 performances per year to 6000 audience members and two free education programs to New York City youth, I write with concern about available spectrum and protection for our wireless microphone and in-ear systems. The Wooster Group was founded in 1975 as a company of artists who make original work for theater, dance, and media. Our company's work relies heavily on the use of wireless microphone and in-ear technology.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Wireless microphones and in-ear receivers are integral to our work as a company. In every show that we produce all of our performers wear wireless microphones, and the crafting of the live performers' amplified voices is a deeply important part of the overall design of our performances. Additionally all actors on stage wear a in-ear wireless system which allows them to follow an audio "track" which scores their

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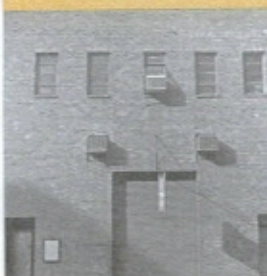
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## THE PERFORMING GARAGE

33 Wooster Street

New York, NY 10013

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entire performance. This is a vital part of our method as a company, and in many cases we will have multiple in-ear frequencies used on stage to feed different performers different sources.

In a typical performance we may have anywhere between 10 and 20 wireless receivers and transmitters in use. We currently use analog transmitters and receivers operating in the 626-628 MHz and 516-558 MHz ranges. We own all of our own equipment and when we purchase it we generally hope it will last at least 10 years. When we moved from the 700 MHz band we had to replace all our previously owned equipment which cost our company around \$15,000. Live sound is an extremely important part of our work and we currently have two sound professionals on full time staff, both with years of professional sound design experience and degrees in theater and music.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Thank you for seeking Public Comment on this issue. I can not overstate how important wireless audio is to our work as a theater company, as it is to many other arts organizations making contemporary work. We have already invested heavily in new equipment when we moved from the 700 MHz band and have also already spent a considerable amount of money beginning to move our equipment to the 500 MHz band. I would ask that you ensure that as we continue to make this change to the 500 band that we can rely that this equipment will be usable without interference in the future.

Performing arts provides a vital community service while providing jobs and opportunities to artists and contributing to the local economy. I strongly support the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a great idea that could have vast benefits for our work and our artistic community.

Sincerely,



Pamela Reichen  
General Manager of The Wooster Group